Case 4:22-md-03047-YGR Document 1078 Filed 08/21/24 Page 1 of 12

1	Plaintiffs ¹ and Meta Platforms, Inc. f/k/a Facebook, Inc., Facebook Holdings, LLC,				
2	Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram				
3	LLC, and Siculus Inc., and Mark Elliot Zuckerberg ("Meta Entities"); Snap Inc.; TikTok Inc. and				
4	ByteDance Inc. ("TikTok Entities"); and YouTube, LLC and Google LLC ("Google Entities")				
5	(collectively "Defendants") (together the "Parties") by and through their counsel of record hereby				
6	submit this Joint Stipulation Modifying Temporary Sealing Procedure Deadline.				
7	On August 6, 2024, the Parties submitted a Joint Letter Brief Regarding Plaintiffs'				
8	Responses and Defendants' Requests for Production. See ECF No. 1051. The Parties also jointly				
9	submitted a Temporary Sealing Motion pertaining to that brief, and subsequently filed the				
10	unredacted brief under seal on August 6, 2024. See ECF No. 1052.				
11	Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), the Parties				
12	hereby stipulate to extend the time to file the Omnibus Sealing Stipulation to 21 days after the				
13	briefing was filed, i.e., until August 27, 2024.				
14	DATED: August 21, 2024 Respectfully submitted,				
15	By: /s/ Previn Warren				
16	PREVIN WARREN MOTLEY RICE LLC				
17	401 9th Street NW Suite 630 Washington DC 20004				
18	Telephone: 202-386-9610				
19	pwarren@motleyrice.com				
20	LEXI J. HAZAM LIEFF CABRASER HEIMANN &				
	BERNSTEIN, LLP				
21	275 BATTERY STREET, 29TH FLOOR				
22	SAN FRANCISCO, CA 94111-3339 Telephone: 415-956-1000				
23	lhazam@lchb.com				
24	Co-Lead Counsel				
25	CHRISTOPHER A. SEEGER				
26	SEEGER WEISS, LLP				
27	55 CHALLENGER ROAD, 6TH FLOOR RIDGEFIELD PARK, NJ 07660				
28					
ļ	For the purposes of this stipulation, "Plaintiffs" refers to personal injury Plaintiffs. JOINT STIPULATION MODIFYING TEMPORARY SEALING				
	- 2 - PROCEDURE DEADLINE				

	Case 4:22-md-03047-YGR	Document 1078 Filed 08/21/24 Page 3 of 12
1		Telephone: 973-639-9100 cseeger@seegerweiss.com
2		cseeger @ seeger werss.com
3		Counsel to Co-Lead Counsel
4		JENNIE LEE ANDERSON
5		ANDRUS ANDERSON, LLP 155 MONTGOMERY STREET, SUITE 900
		SAN FRANCISCO, CA 94104
6		Telephone: 415-986-1400 jennie@andrusanderson.com
7		jennie @ andrusanderson.com
8		Liaison Counsel
9		EMILY C. JEFFCOTT
10		MORGAN & MORGAN 633 WEST FIFTH STREET, SUITE 2652
11		LOS ANGELES, CA 90071
12		Telephone: 213-787-8590 ejeffcott@forthepeople.com
13		JOSEPH VANZANDT BEASLEY ALLEN
14		234 COMMERCE STREET
15		MONTGOMERY, LA 36103 Telephone: 334-269-2343
16		joseph.vanzandt@beasleyallen.com
17		Federal/State Liaisons
18		
19		MATTHEW BERGMAN GLENN DRAPER
		SOCIAL MEDIA VICTIMS LAW CENTER
20		821 SECOND AVENUE, SUITE 2100 SEATTLE, WA 98104
21		Telephone: 206-741-4862
22		matt@socialmediavictims.org glenn@socialmediavictims.org
23		
24		JAMES J. BILSBORROW WEITZ & LUXENBERG, PC
25		700 BROADWAY
26		NEW YORK, NY 10003 Telephone: 212-558-5500
		jbilsborrow@weitzlux.com
27		JAYNE CONROY
28		SIMMONS HANLY CONROY, LLC

1 112 MADISON AVE, 7TH FLOO)R
NEW YORK, NY 10016 Telephone: 917-882-5522	
jconroy@simmonsfirm.com	
4 ANDRE MURA	
GIBBS LAW GROUP, LLP 1111 BROADWAY, SUITE 2100)
OAKLAND, CA 94607	
Telephone: 510-350-9717 amm@classlawgroup.com	
8 ALEXANDRA WALSH	
9 WALSH LAW 1050 Connecticut Ave, NW, Suite	500
Washington D.C. 20036	
Telephone: 202-780-3014 awalsh@alexwalshlaw.com	
MICHAEL M. WEINKOWITZ LEVIN SEDRAN & BERMAN,	LLP
510 WALNUT STREET	
SUITE 500 PHILADELPHIA, PA 19106	
Telephone: 215-592-1500	
mweinkowitz@lfsbalw.com	
Plaintiffs' Steering Committee Lea	adership
RON AUSTIN RON AUSTIN LAW	
19 400 MANHATTAN BLVD.	
HARVEY, LA 70058 Telephone: 504-227–8100	
raustin@ronaustinlaw.com	
PAIGE BOLDT WALSH LAW	
4 Dominion Drive, Bldg. 3, Suite	100
San Antonio, TX 78257 Telephone: 210-448-0500	
PBoldt@alexwalshlaw.com	
THOMAS P. CARTMELL	I D
WAGSTAFF & CARTMELL L 27 4740 Grand Avenue, Suite 300	LF
Kansas City, MO 64112 Telephone: 816-701-1100	

	Case 4:22-md-03047-YGR	Document 1078	Filed 08/21/24	Page 5 of 12	
1	tcartmell@wcllp.com				
2			RAH EMERY		
3			E NDY JOHNSON O WEST MAIN STI	VAUGHN EMERY PSC	
4			OUISVILLE, KT 402		
5			lephone: 859-600-6		
		SCI	nery@justicestartsh	ere.com	
6			ARRIE GOLDBERG		
7			A. GOLDBERG, P Court St.	LLC	
8			ooklyn, NY 11241	200	
9			lephone: 646-666-89 rie@cagoldberglaw		
10					
			NALD E. JOHNSC E NDY JOHNSON	ON, JR. VAUGHN EMERY PSC	
11		600	O WEST MAIN STI	REET, SUITE 100	
12			OUISVILLE, KT 402 lephone: 859-578-4		
13			hnson@justicestarts		
14		212	N-TING MARY LII	ī	
15			LSTOCK WITKI		
			EAST MAIN STRE		
16			EAST MAIN STRI NSACOLA, FL 325	· · · · · · · · · · · · · · · · · · ·	
17			lephone: 510-698-9:	566	
18		ml	iu@awkolaw.com		
19			MES MARSH	L DV L G	
20			ARSH LAW FIRM HUDSON YARDS		
21		NE	EW YORK, NY 100	01-2170	
			lephone: 212-372-30 nesmarsh@marshlav		
22		J			
23					
24					
25					
26					
27					
28					

	Case 4:22-md-03047-YGR	Document 1078 Filed 08/21/24 Page 6 of 12
1		JOSEPH E. MELTER
1		KESSLER TOPAZ MELTZER & CHECK
2		LLP 280 KING OF PRUSSIA ROAD
3		RADNOR, PA 19087
4		Telephone: 610-667-7706
5		jmeltzer@ktmc.com
6		HILLARY NAPPI HACH & ROSE LLP
7		112 Madison Avenue, 10th Floor
		New York, New York 10016
8		Telephone: 212-213-8311 hnappi@hrsclaw.com
9		
10		EMMIE PAULOS LEVIN PAPANTONIO RAFFERTY
11		316 SOUTH BAYLEN STREET, SUITE 600
12		PENSACOLA, FL 32502 Telephone: 850-435-7107
		epaulos@levinlaw.com
13		RUTH THI RIZKALLA
14		THE CARLSON LAW FIRM, PC
15		1500 ROSECRANS AVE., STE. 500 MANHATTAN BEACH, CA 90266
16		Telephone: 415-308-1915
17		rrizkalla@carlsonattorneys.com
18		ROLAND TELLIS
		DAVID FERNANDES BARON & BUDD, P.C.
19		15910 Ventura Boulevard, Suite 1600
20		Encino, CA 91436 Telephone: 818-839-2333
21		rtellis@baronbudd.com
22		dfernandes@baronbudd.com
23		
24		
25		
26		
27		
28		

ĺ	Case 4:22-md-03047-YGR	Document 1078	Filed 08/21/24	Page 7 of 12
1		N	MELISSA YEATES	
2			ESSLER TOPAZ N LP	MELTZER & CHECK
3			80 KING OF PRUSS	IA ROAD
			ADNOR, PA 19087 elephone: 610-667-7	706
4			nyeates@ktmc.com	700
5		Γ	DIANDRA "FU" DEF	BROSSE
6		Z	IMMERMANN	JNOSSE .
7			OICELLO LEVITT 05 20th St North	
8		S	uite 1500	
9			irmingham, Alabama elephone: 205-855-5	
10			@dicellolevitt.com	700
		F	laintiffs' Steering Co	mmittee Membership
11				•
12		Α	ttorneys for Individue	al Plaintiffs
13			OMNOTON 6 DIE	NI INICI I I D
14		C	OVINGTON & BUF	CLING LLP
15		-	S/ Gregory L. Halperi	
16			fregory L. Halperin, <i>p</i> OVINGTON & BUF	
17			the New York Times	Building
18		N	20 Eighth Avenue Iew York, NY 10018	
			'elephone: (212) 841- acsimile: (212) 841-1	
19			mail: ghalperin@cov	
20		Δ	shley M. Simonsen,	SBN 275203
21		C	OVINGTON & BUF	RLING LLP
22			999 Avenue of the St os Angeles, CA 9006	
23		Т	elephone: (424) 332-	4800
24			acsimile: +1 (424) 3: mail: asimonsen@co	
25				
			hyllis A. Jones, <i>pro h</i> aul W. Schmidt, <i>pro</i>	
26		C	OVINGTON & BUF	
27			One City Center 50 Tenth Street, NW	
28			Vashington, DC 2000	1-4956

	Case 4:22-md-03047-YGR	Document 1078 Filed 08/21/24 Page 8 of 12
1		Telephone: + 1 (202) 662-6000
2		Facsimile: + 1 (202) 662-6291
3		Email: pajones@cov.com
		Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings,
4		LLC; Facebook Operations, LLC; Facebook
5		Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot
6		Zuckerberg
7		FAEGRE DRINKER LLP
8		By: /s/ Andrea Roberts Pierson
9		Andrea Roberts Pierson, pro hac vice
10		FAEGRE DRINKER LLP 300 N. Meridian Street, Suite 2500
11		Indianapolis, IN 46204
12		Telephone: + 1 (317) 237-0300 Facsimile: + 1 (317) 237-1000
12		Email: andrea.pierson@faegredrinker.com
13		Email: amy.fiterman @faegredrinker.com
14		Amy R. Fiterman, pro hac vice
15		FAEGRE DRINKER LLP 2200 Wells Fargo Center
16		90 South Seventh Street
17		Minneapolis, MN 55402
		Telephone: +1 (612) 766-7768 Facsimile: +1 (612) 766-1600
18		Email: amy.fiterman@faegredrinker.com
19		Geoffrey Drake, pro hac vice
20		KING & SPALDING LLP
21		1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309
22		Tel.: 404-572-4600
23		Email: gdrake@kslaw.com Email: dmattern@kslaw.com
24		David Mattern, pro ha vice
		KING & SPALDING LLP
25		1700 Pennsylvania Avenue, NW, Suite 900 Washington, D.C. 20006
26		Telephone: +1 (202) 626-2946
27		Email: dmattern@kslaw.com
28		Attorneys for Defendants TikTok Inc. and

	Case 4:22-md-03047-YGR	Document 1078 Filed 08	/21/24	Page 9 of 12			
1		ByteDance In	с.				
2		MUNGER, TOLLES & OLSEN LLP					
3			D1 ·				
4		By: <u>/s/ Jonathan J</u> Jonathan H. F					
5		MUNGER, T 560 Mission S		& OLSON LLP			
		San Francisco					
6		Telephone: (4					
7		Facsimile: (4 Email: jonath					
8		-					
9		Rose L. Ehler Victoria A. D	*	9652) a (SBN 284199)			
10		Laura M. Lop	ez, (SBN	N 313450)			
		Ariel T. Tesh	•	N 324238) & OLSON LLP			
11		•		nue, 50th Floor			
12		Los Angeles,					
13		Telephone: (213) 683-9100					
	Facsimile: (213) 687-3702 Email: rose.ehler@mto.com						
14				reva@mto.com			
15		Email: Ariel.	l'eshuva(@mto.com			
16			-	ac vice forthcoming)			
17		· · · · · · · · · · · · · · · · · · ·		& OLSON LLP			
		601 Massach Suite 500 E	useus Av	C., IN W. St.,			
18		Washington,					
19		Telephone: (2 Facsimile: (20					
20		Email: lauren					
21		Attorneys for	Defenda	nt Snap Inc.			
22		SKADDEN	ARPS S	LATE, MEAGHER &			
23		FLOM LLP	, in a s, s	Bill, williendie			
24		By: <u>/s/ Jessica Do</u>	<u>ividson</u>				
25		Jessica David					
26		SKADDEN, FLOM LLP	arps, S	LATE, MEAGHER &			
		One Manhatta		10001			
27		New York, N Phone: (212)					
28		Fax: (917) 77		_			

	Case 4:22-md-03047-YGR	Document 1078	B Filed 08/21/24	Page 10 of 12
1			jessica.davidson@ska	ndden.com
2			Nina R. Rose, pro had	e vice
3			-	SLATE, MEAGHER &
4			1440 New York Aver	
5			Washington, D.C. 200 Telephone: (202) 371	
			Facsimile: (202) 661-	
6			nina.rose@skadden.co	<u>om</u>
7			Attorneys for Defenda	ant Snap Inc.
8			WILSON SONSINI (GOODRICH & ROSATI
9			Professional Corporat	tion
10		Bv:	/s/ Brian M. Willen	
11			Brian M. Willen	
12			WILSON SONSINI O	GOODRICH & ROSATI
			New York, New York	· · · · · · · · · · · · · · · · · · ·
13			Telephone: (212) 999	
14			Facsimile: (212) 999- Email: bwillen@wsgr	
15			C	
16			Lauren Gallo White Samantha A. Machoc	k
				GOODRICH & ROSATI
17			One Market Plaza, Sp San Francisco, CA 94	pear Tower, Suite 3300
18			Telephone: (415) 947	
19			Facsimile: (415) 947-	2099
20			Email: lwhite@wsgr. Email: smachock@w	
21			Christopher Chiou	
22			WILSON SONSINI	GOODRICH & ROSATI
23			633 West Fifth Street Los Angeles, CA 900	
			Telephone: (323) 210	-2900
24			Facsimile: (866) 974- Email: cchiou@wsgr.	
25			Linuii. Comode wsgi.	Com
26			Attorneys for Defendo Google LLC	ants YouTube, LLC and
27			WILLIAMS & CON	NOLLATID
28			WILLIAWS & CON	NOLLI LLF
			10 n m ammu 1 1 m1	

	Case 4:22-md-03047-YGR	Document 1078	Filed 08/21/24	Page 11 of 12
1			/ <i>Joseph G. Petrosin</i> seph G. Petrosinelli	
2		jpo	etrosinelli@wc.com shley W. Hardin	
3		ah	ardin@wc.com	
4			30 Maine Avenue, S'ashington, DC 2002	
5			elephone.: 202-434-5 ax: 202-434-5029	5000
6				W. T. I. II.G. I
7			torneys for Defenda oogle LLC	nts YouTube, LLC and
8		М	ORGAN, LEWIS	& BOCKIUS LLP
9			Brian M. Ercole	
10		Br	rian Ercole (<i>pro hac</i> 00 Brickell Avenue,	vice) Suite 1600
11		M	iami, FL 33131-307 el.: 305.415.3416	
12			ian.ercole@morgan	lewis.com
13		Y ₂	ardena R. Zwang-W 00 South Grand Ave	eissman (SBN 247111)
14		Lo	os Angeles, CA 900° el.: 213.612.7238	
15				nan@morganlewis.com
16			ephanie Schuster (<i>pa</i> 11 Pennsylvania Av	
17		W	ashington, DC 2000	
18			el.: 202.373.6595 ephanie.schuster@mor	rganlewis.com
19		At	torneys for Defenda	nts YouTube, LLC and
20		$G\epsilon$	oogle LLC	
21				
22				
23				
24				
25				
26				
27				
28				

ATTESTATION I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto. **DATED:** August 21, 2024 /s/ Previn Warren Previn Warren MOTLEY RICE LLC 401 9th Street NW Suite 630 Washington DC 20004 Telephone: 202-386-9610 pwarren@motleyrice.com